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*Attorneys for Defendant  
Amazon.com, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NEW JERSEY MANUFACTURERS  
INSURANCE GROUP a/s/o ANGELA  
SIGISMONDI,

Plaintiff,

v.

AMAZON.COM, INC., ABC  
CORPORATION 1-10 and JOHN DOES  
1-10,

Defendants.

Civil Action No. 2:16-9014 (MCA)(MAH)

**DECLARATION OF BETH S. ROSE IN  
SUPPORT OF *PRO HAC VICE*  
APPLICATION OF BRENDAN MURPHY**

BETH S. ROSE, under penalty of perjury, declares as follows:

1. I am an attorney at law in good standing in the State of New Jersey and a member of the law firm of Sills Cummis & Gross P.C., attorneys for Defendant Amazon.com, Inc. (“Amazon”). I am counsel of record for Amazon, and submit this Declaration in support of the *pro hac vice* application of Brendan Murphy of Perkins Coie LLP, located in Seattle, Washington.

2. As set forth in his accompanying Declaration, Mr. Murphy is a member of various state bars and federal courts. The years Mr. Murphy was admitted to each bar and the address of

the office maintaining the role of such members of its bar are set forth in Mr. Murphy's accompanying Declaration.

3. As set forth in his accompanying Declaration, Mr. Murphy is a member in good standing and eligible to practice in the jurisdictions and courts where he is admitted, and he is not currently disbarred or suspended in any jurisdiction and there are no pending disciplinary matters against him.

4. As set forth in his accompanying Declaration, in the event Mr. Murphy is admitted *pro hac vice* in this action, he will comply with all of the requirements of *L. Civ. R. 101.1*.

5. Upon admission *pro hac vice* of Mr. Murphy, I will continue to participate and serve as counsel of record in this matter and comply with all requirements of *L. Civ. R. 101.1*.

6. Specifically, as required by *L. Civ. R. 101.1(c)(4)*, I will continue to receive all notices, orders and pleadings, and file all papers, enter appearances for parties, sign stipulations or sign and receive payments on judgments, decrees or orders.

7. I will also appear at all proceedings and sign all pleadings, briefs and other papers.

8. As required by *L. Civ. R. 101.1(d)*, I will continue to strictly observe the dates fixed for scheduling conferences, motions, pretrial conferences, trials or any other proceedings.

9. As counsel of record, I will be responsible for the conduct of the cause and counsel in this matter.

10. Plaintiff's counsel consents to the application to admit Brendan Murphy *pro hac vice* in this matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

s/ Beth S. Rose  
BETH S. ROSE

Dated: October 18, 2019